

POWER PRODUCTION ECONOMICS

The executive summary is incomplete. As with the other economics reports, significance thresholds are provided for purely economic impacts. The report should be revised to clarify that CEQA and NEPA do not consider impacts solely affecting economics to be significant, however this material is relevant to identifying other potential social and economic impacts such as environmental justice, jobs, and housing issues. This section has many incomplete sections, therefore it is not currently sufficient to support an EIR/EIS section.

Conformance to Outline

Power Production and Energy

Affected Environment

- TOC is missing
- Subsections for 4.4 through 4.7 differ from standard outline (4.x.1 should be Historical Perspectives; 4.x.2 should be Current Resource Conditions).

Environmental Consequences

- TOC is missing
- Section 2.0 (Exec. Summary) is missing
- Much is missing from Section 5.2
- Outline not followed for Section 5
- Standard section 5.3 tables are missing.

REVIEW COMMENTS
CALFED BAY-DELTA PROGRAM PEIS TECHNICAL REPORTS
POWER PRODUCTION ECONOMICS

AFFECTED ENVIRONMENT

| No. | Page/Para | Comment |
|-----|-----------|---|
| 1 | TOC | Add TOC |
| 2 | General | Report Format: Minor inconsistencies with the standard technical report format. (1) do not indent paragraphs (2) 1 st level heading should not be underlined (3) Many of the 2 nd and 3 rd level headings are cumbersome, recommend shortening them - see mark-up copy. |

9/30/97

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ENVIRONMENTAL IMPACTS/ CONSEQUENCES

| No. | Page/Para | Comment |
|-----|-------------------------------|--|
| 1 | TOC | Add TOC |
| 2 | ES | Executive Summary is incomplete. Complete section. Be sure enough detail is provided to evaluate each alternative against no action. Need to clearly state if there are significant impacts and what mitigation is required (in context to comment below). Table 1: recommend adding a fourth column to show the net change between generation and use. |
| 3 | Page 3, 1 st para. | "Examples of potential alternative components were used to develop the representative ranges of impacts because the specific components... have not been identified..." Recommend adding a sentence clarifying that this range is anticipated to capture all possible impacts. |
| 4 | Section 4.0 and general | Significance thresholds are provided for economic impacts. Because this report is in support of a NEPA/CEQA document, and because economic impacts are essentially irrelevant in this context, it is recommended that significance determinations not be made in this report. Rather quantified data should be provided for the reader to assess the magnitude of change. If this report claims there are significant economic impacts, it is implied that mitigation will be required. Although legally debatable, the public could perceive that CALFED would be responsible for mitigating economic impacts (not the spirit of NEPA/CEQA). We should not put CALFED in this position without their consent. Recommend the following text be inserted up front in section 4.0; "The NEPA and CEQA do not require significance determination for economic impacts, in and of themselves. However, the following criteria have been defined to determine the magnitude and intensity of the impacts to power and energy supplies." At this point, the word "significant" should be replaced with non-value-laden terms, such as substantial or moderate. |
| 5 | Section 4.2 | Threshold limit is not quantified. If it is decided that significance determinations should remain, the threshold in 4.2 must be quantified. It is inappropriate to say there is a <u>significant</u> impact if it <u>significantly</u> reduces a variable. Define significantly. |
| 6 | Section 5 | Diverges from the standard technical report format, in that it looks at the entire study area as a whole prior to evaluating individual regions. No change. Although out of format, it appears logical given the interrelationship of the CVP and SWP. |
| 7 | General | There are still a lot of incomplete sections (e.g., pgs. 11, 15, 16, 19, 23, 25, 26). Sections should be finished and reviewed prior to final report. |

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